

LEASON ELLIS

December 6, 2020

**VIA ECF**

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

**MEMO ENDORSED**

The Application is granted.

SO ORDERED:

  
Paul G. Gardephe, U.S.D.J.

Dated: December 8, 2020

One Barker Avenue, Fifth Floor  
White Plains, New York 10601  
t. 914.821.3075  
f. 914.288.0023

Cameron S. Reuber  
Partner  
Reuber@LeasonEllis.com

RE: *Tianhai Lace USA, Inc. v. G-III Leather Fashions, Inc.*  
Case No.: 20-cv-765-PGG

Dear Judge Gardephe:

We are counsel for Plaintiff Tianhai Lace USA Inc. (“Tianhai”) in the above-referenced action. We write jointly with counsel for Defendant G-III Leather Fashions, Inc. (“G-III”) (collectively the “Parties”) in compliance with your directives at the Initial Pretrial Conference (IPC) and subsequent Order (*Dkt.* 28) to supply a status report regarding the Parties’ settlement discussions.

In short, G-III has collected and supplied the undersigned with the information requested during the IPC. We are reviewing said disclosures with Tianhai and reasonably expect to tender a settlement offer to G-III by the end of this week that, if accepted, will resolve all claims. G-III expects that it will need some time to review the anticipated proposal with both its business and in-house legal personnel, given the nature of the discussions to date.

Having conferred on the matter, the parties respectfully suggest extending the current stay by an additional sixty (60) days, after which the Parties will provide the Court with a further status letter.

WHEREFORE, the parties respectfully request that the Court enter an Order extending the current stay by sixty (60) days to permit progression of the settlement dialogue.

Respectfully submitted,



Cameron S. Reuber